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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MARY KIM PICCININI, and  
GEORGE ELDRIDGE & SON, INC.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:17-cv-00584-HDM-WGC

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO MOTION TO  
STRIKE (ECF NO. 55)**

**(FIRST REQUEST)**

Defendant, United States of America, and Plaintiffs, Mary Kim Piccinini and George Eldridge & Son, Inc., hereby stipulate and agree that Defendant may have a 21-day extension to file its response to Plaintiffs' Motion to Strike Documents Produced with Defendant's Amended Third Supplemental Disclosure Statement. (ECF No. 55). Defendant's response is currently due on December 20, 2019. An extension is needed, however, because key agency representatives are out of the office due to the holidays and their input is needed in preparing and finalizing Defendant's response to Plaintiff's motion. Also, defense counsel was out of the office on

1 business and due to illness the week of December 9, 2019. An extension would give Defendant  
2 up to and including January 10, 2020, in which to respond to Plaintiffs' motion.

3 Defense counsel contacted Plaintiffs' counsel via email and telephone, and Plaintiffs'  
4 counsel, Tom Brennan, advised that he does not object to Defendant's extension request. This is  
5 Defendant's first request for an extension of time. Defendant seeks this extension request in good  
6 faith and not for the purpose of delay.

7 Dated: December 16, 2019.

8 NICHOLAS A. TRUTANICH  
9 United States Attorney

ROSE LAW OFFICE

10 s/ Holly A. Vance  
11 HOLLY A. VANCE  
Assistant United States Attorney  
Counsel for Defendant

s/ Sean P. Rose  
SEAN P. ROSE  
Counsel for Plaintiffs

12 DURNEY & BRENNAN LTD.

13 s/ Thomas R. Brennan  
14 THOMAS R. BRENNAN  
Counsel for Plaintiffs

15  
16 **IT IS SO ORDERED.**

17  
18 **DATED: December 17, 2019.**

William G. Cobb  
19 **HON. WILLIAM G. COBB**  
20 **United States Magistrate Judge**